

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,
the STATE OF MICHIGAN, and
ex rel. FADI JAAFAR,

Plaintiffs-Relator,

CIVIL ACTION NO.: 17-10955
HON. BERNARD A. FRIEDMAN
Magistrate Judge Elizabeth Stafford

Vs.

ALI EL-KHALIL, DPM,

Defendant.

RELATOR'S NOTICE OF VOLUNTARY DISMISSAL; UNITED STATES OF
AMERICA'S CONSENT TO VOLUNTARY DISMISSAL; THE STATE OF
MICHIGAN'S CONSENT TO VOLUNTARY DISMISSAL

REQUEST FOR DISMISSAL BY RELATOR

Pursuant to Fed. R. Civ. P. 41(a)(2), *qui tam* plaintiff Fadi Jaafar (the "Relator") hereby requests that the Court dismiss, without prejudice, the above-captioned action ("this action"), and all of his claims against the defendant in this action, including but not limited to, his claims for reasonable attorney's fees, expenses and costs pursuant to the federal False Claims Act, 31 U.S.C. § 3730(d) and the Michigan Medicaid False Claims Act, Mich. Comp. Laws § 400.610a.

Dated: January 7, 2020

Respectfully submitted,

MAHANY LAW

/s/ Brian H. Mahany

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CONSENT OF THE UNITED STATES OF AMERICA

In the interests of justice, the Attorney General of the United States of America (“United States”), through the undersigned attorneys, hereby consents to the dismissal of this action without prejudice as to the United States.

Dated: January 7, 2020

Respectfully Submitted,

MATTHEW SCHNEIDER
United States Attorney

s/ Caroline Burgunder
Caroline Burgunder
Assistant United States Attorney
United States Attorney’s Office
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Attorneys for the United States of America

CONSENT OF THE STATE OF MICHIGAN

In the interests of justice, the Attorney General of the State of Michigan, through the undersigned attorneys, hereby consents to the dismissal of this action without prejudice as to the State of Michigan.

Dated: January 7, 2020

Respectfully Submitted,

DANA NESSEL
Michigan Attorney General

s/ Jason R. Evans
JASON R. EVANS (P61567)
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Attorneys for the State of Michigan

Certificate of Service

On January 7, 2020, I electronically filed the foregoing Relator's Notice of Voluntary Dismissal; Consent of the United States of America to the Notice of Voluntary Dismissal; and the State of Michigan's Consent to the Notice of Voluntary Dismissal via this Court's electronic filing system. As such, all counsel of record have received copies of this filing via electronic means. Additionally, I emailed a copy of the proposed Order Dismissing the Action Without Prejudice to all counsel of record.

s/ Brian H. Mahany
Brian H. Mahany